

In the United States District Court for the  
Northern District of Illinois, Eastern Division

Blythe Holdings, Inc., a foreign corporation and  
Chicago 100, Inc., an Illinois corporation,

Plaintiffs,

v.

Flawless Financial Corporation, an Illinois corporation, *et al.*

Defendants.

No.: 06 CV 5262

Judge Dow

Motion for Judgment Against Defendants Flawless Financial Corporation,  
Flawless Financial Mortgage Corporation and Tracy Williams

Plaintiffs move for judgment as follows:

1. On January 15, 2009 the court entered an order of default against Flawless Financial Corporation, Flawless Financial Mortgage Corporation and Tracy Williams due to their failure to appear, to plead or to defend this action. [Docket No. 220] The complaint and its allegations were confessed against them.

2. On November 6, 2009 these defendants' motion for relief from the order of default under F. R. Civ. P. 55(c) was denied. [Docket No. 262]. Other than the motion to vacate the default order, these defendants have not participated in this case since 2007. The defendants remain in default.

3. Defendant John DeAngelis went bankrupt and his liabilities, to the extent they were not covered by insurance, were discharged in 2009. The bankruptcy court had lifted the stay as to those claims for negligence covered by liability insurance which DeAngelis has since defended.

4. On July 23, 2012 the court granted DeAngelis and the Brown Udell defendants' motions for summary judgment thus disposing of all of the remaining claims against the attorney defendants.

5. On September 25, 2012 the court dismissed defendant Shirley Coleman on plaintiff's motion thus disposing of all claims pending against her.

6. The only remaining claims are against the Flawless Financial Corporation, Flawless Financial Mortgage Corporation and Tracy Williams defendants, who are in default.

7. The plaintiff seeks a default judgment against Flawless Financial Corporation, Flawless Financial Mortgage Corporation and Tracy Williams pursuant to F. R. Civ. P. 55(b)(2) in the sum of \$ 9,319,999.98 which represents actual damages of \$3,106,666.66 and trebling them pursuant to 18 U.S.C. 1984(c) thus ending this litigation by a final judgment order pursuant to F. R. Civ. P. 54.

8. In support of its motion for a default judgment against the Flawless Financial Corporation, Flawless Financial Mortgage Corporation and Tracy Williams defendants the plaintiff attaches the sworn declaration of Stephanie Hill, the principal of the two plaintiffs.

Wherefore the plaintiffs pray for the entry of a judgment against Flawless Financial Corporation, Flawless Financial Mortgage Corporation and Tracy Williams defendants, and each of them, in the amount of \$ 9,319,999.98 plus costs and attorney's fees to be determined by separate fee petition and for such other and further relief as the court determines is warranted.

November 5, 2012

Blythe Holdings, Inc. and  
Chicago 100, Inc., plaintiffs

By: s/ Tomas Petkus  
One of their attorneys

Craig D. Tobin  
Tomas Petkus  
Tobin & Muñoz, L.L.C.  
Attorneys for Plaintiffs  
Three First National Plaza, #1950  
Chicago, IL 60602-4298  
Office (312) 641-1321  
Facsimile (312) 641-5220  
Email [ctobin@barristers.com](mailto:ctobin@barristers.com)  
[tomaspetkus@barristers.com](mailto:tomaspetkus@barristers.com)

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